UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

Case No. 21-CR-91 (RCL)

CRAIG MICHAEL BINGERT and

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ISAAC STEVE STURGEON,

v.

Defendants.

STIPULATION OF THE PARTIES

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendants, Craig Bingert and Isaac Sturgeon, with the concurrence of their attorneys, agree and stipulate to the following:

Videos and Photographs Recorded by Third Parties

Individuals who were present at the U.S. Capitol building, on Capitol grounds, and at the Stop the Steal rally near the White House, recorded videos and took photographs, and many of these videos and photographs are publicly available. The following videos and photographs, identified by the government by exhibit number, are all fair and accurate depictions of the events at the U.S. Capitol or the Stop the Steal rally on January 6, 2021, and are authentic in that they are what they purport to be: Government Exhibits 401-413; Government Exhibits 1101 – 1109. Note that the Government has applied graphics in the form of circles or squares to some of these Exhibits.

Respectfully submitted,

For the Defendants:

CRAIG BINGERT

Defendant

Allen H. Orenberg Digitally signed by Allen H. Orenberg Date: 2023.05.13 09:26:30 -04'00'

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ISAAC STURGEON

Defendant

MARIA JACOB

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For the Government:

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By: /s/ Kaitlin Klamann

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By: /s/ Courtney A. Howard

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